

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

MCKENNA DUFFY and MICHAEL BRETT,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

YARDI SYSTEMS, INC., BRIDGE  
PROPERTY MANAGEMENT, L.C.,  
CALIBRATE PROPERTY MANAGEMENT,  
LLC, DALTON MANAGEMENT, INC.,  
HNN ASSOCIATES, LLC, LEFEVER  
MATTSON PROPERTY MANAGEMENT,  
MANCO ABBOTT, INC., MORGUARD  
MANAGEMENT COMPANY; R.D.  
MERRILL REAL ESTATE HOLDINGS,  
LLC, SUMMIT MANAGEMENT  
SERVICES, INC., and CREEKWOOD  
PROPERTY CORPORATION,

Defendants.

Case No. 2:23-cv-01391-RSL

**STIPULATED MOTION RE:  
SUBMISSION OF PROPOSED  
AGREEMENT REGARDING THE  
DISCOVERY OF ELECTRONICALLY  
STORED INFORMATION**

Pursuant to Local Civil Rules 7(d)(1) and 10(g), Plaintiffs McKenna Duffy and Michael Brett (“Plaintiffs”) and Defendants Yardi Systems, Inc. (“Yardi”), Bridge Property Management, L.C. (“Bridge”), Calibrate Property Management LLC (“Calibrate”), Creekwood Property Corporation (“Creekwood”), Dalton Management, Inc. (“Dalton”), LeFever Mattson Property Management (“LeFever”), HNN Associates, LLC (“HNN”), Manco Abbott, Inc. (“Manco”), Morguard Management Company Inc. (“Morguard”), Summit Management Services, Inc. (“Summit”), and R.D. Merrill Real Estate Holdings, LLC (“Pillar

Properties”) (collectively “Defendants”), by and through their respective counsel, hereby stipulate as follows:

1. WHEREAS, the Parties<sup>1</sup> submitted a stipulated motion to extend the deadlines for submitting a proposed agreement regarding the Discovery of Electronically Stored Information (“ESI Protocol”) and a proposed Protective Order to April 1, 2024. ECF No. 145.

2. WHEREAS, this Court granted the Parties’ stipulated motion and ordered the Parties to present a Protective Order and an ESI Protocol no later than April 1, 2024. ECF. No. 147.

3. WHEREAS, the Parties submitted a stipulated motion to extend the April 1, 2024 deadline to submit an ESI Protocol to April 26, 2024. ECF No. 160.

4. WHEREAS, this Court granted the Parties’ stipulated motion and ordered the Parties to present an ESI Protocol no later than April 26, 2024. ECF. No. 161.

5. WHEREAS, the Parties have continued to meet and confer regarding the ESI Protocol, the Parties continue to narrow the issues in dispute, the Parties would benefit from more time to either reach agreement or narrow the scope of any disputed issues, and, subject to the Court’s approval, have agreed to continue the deadline for submitting an ESI Protocol until May 6, 2024;

THEREFORE, the Parties STIPULATE AND AGREE that:

The Parties will present an ESI Protocol, as well as any related disputed issues, by no later than May 6, 2024.

STIPULATED to this 25<sup>th</sup> day of April, 2024.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated this 26th day of April, 2024.



Robert S. Lasnik  
United States District Court Judge

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<sup>1</sup> Defendants and Plaintiffs are collectively referred to as the “Parties.”

RESPECTFULLY SUBMITTED,

**HAGENS BERMAN SOBOL SHAPIRO  
LLP**

/s/ Steve W. Berman

Steve W. Berman (WSBA No. 12536)  
Theodore Wojcik (WSBA No. 55553)  
Stephanie A. Verdoia (WSBA No. 58636)  
Xiaoyi Fan (WSBA No. 56703)  
1301 Second Avenue, Suite 2000  
Seattle, WA 98101  
Telephone: (206) 623-7292  
Facsimile: (206) 623-0594  
Email: steve@hbsslaw.com  
Email: tedw@hbsslaw.com  
Email: stephaniev@hbsslaw.com  
Email: kellyf@hbsslaw.com  
  
Rio S. Pierce (*pro hac vice*)  
715 Hearst Avenue, Suite 300  
Berkeley, CA 94710  
Telephone: (510) 725-3000  
Facsimile: (510) 725-3001  
Email: riop@hbsslaw.com

*Attorneys for Plaintiffs MCKENNA DUFFY  
and MICHAEL BRETT*

**VAN KAMPEN & CROWE PLLC**

/s/ Al Van Kampen

Al Van Kampen (WSBA No. 13670)  
P.O. BOX 33632  
Seattle, WA 98133  
Telephone: (206) 441-1121  
Email: avankampen@vkclaw.com

**VINSON & ELKINS LLP**

Michael W. Scarborough (*pro hac vice*)  
Dylan I. Ballard (*pro hac vice*)  
M. Kevin Costello (*pro hac vice*)  
Madison Lo (*pro hac vice*)  
555 Mission Street, Suite 2000  
San Francisco, CA 94105  
Telephone: (415) 979-6900  
Email: mscarborough@velaw.com  
Email: dballard@velaw.com  
Email: kcostello@velaw.com  
Email: mlo@velaw.com

Stephen Medlock (*pro hac vice*)  
2200 Pennsylvania Avenue NW  
Suite 500 West  
Washington, DC 20037  
Telephone: (202) 639-6500  
Email: smedlock@velaw.com

Mackenzie Newman (*pro hac vice*)  
1114 Avenue of the Americas  
32nd Floor  
New York, NY 10036  
Telephone: (212) 237-0000  
Email: mnewman@velaw.com

*Attorneys for Defendant Bridge Property  
Management, L.C.*

**BAILEY DUQUETTE PC**

/s/ Hozaiifa Cassubhai

Hozaiifa Cassubhai (WSBN No. 39512)  
William Burnside (WSBN No. 36002)  
800 Fifth Ave, Suite 101-800  
Seattle, WA 98104  
Phone: (206) 225-2250  
Fax : (866) 233-5869  
Email: hozaiifa@baileyduquette.com  
will@baileyduquette.com

*Attorneys for Defendant Calibrate Property  
Management, LLC*

**FOGARTY LAW GROUP PLLC**

/s/ Paul E. Fogarty

Paul E. Fogarty (WSBN No. 26929)  
1904 Third Avenue, Ste 933  
Seattle, WA 98101  
Telephone: (206) 441-0172  
Email: pfogarty@fogartylawgroup.com

**NORTON ROSE FULBRIGHT US LLP**

Michael Swartzendruber (*pro hac vice*)  
2200 Ross Avenue, Suite 3600  
Dallas, Texas 75201  
Telephone: 214-855-8067  
Email: michael.swartzendruber@  
nortonrosefulbright.com

Eliot Turner (*pro hac vice*)  
1301 McKinney, Suite 5100  
Houston, TX 77010  
Telephone: 713-651-5113  
Email:  
eliot.turner@nortonrosefulbright.com

*Attorneys for Defendant Creekwood  
Property Corporation*

**CABLE HUSTON LLP**

/s/ Brian S. Epley

Brian S. Epley (WSBA No. 48412)  
Jon W. Monson (WSBA No. 43912)  
1455 SW Broadway, Suite 1500  
Portland, OR 97201-3412  
Telephone: (503) 224-3092  
Email: jmonson@cablehuston.com  
Email: bepley@cablehuston.com

*Attorneys for Defendant Dalton Management, Inc.*

**PERKINS COIE LLP**

/s/ David A. Perez

David A. Perez (WSBA No. 43959)  
Elvira Castillo (WSBA No. 43893)  
Tiffany Lee (WSBA No. 51979)  
Marten King (WSBA No. 57106)  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
Telephone: 206.359.6767  
Email: DPerez@perkinscoie.com  
Email: ECastillo@perkinscoie.com  
Email: TiffanyLee@perkinscoie.com  
Email: MKing@perkinscoie.com

Adrianna Simonelli (WSBA No. 58472)  
1120 NW Couch Street, Tenth Floor  
Portland, OR 97209-4128  
Telephone: 503-727-2000  
Facsimile: 503-727-2222

Email: ASimonelli@perkinscoie.com  
*Attorneys for Defendant HNN Associates, LLC*

**SHOOK, HARDY & BACON L.L.P.**

/s/ Steven Rich

Steven Rich (WSBA No. 48444)  
701 Fifth Avenue, Suite 6800  
Seattle, Washington 98104  
Telephone: (206) 344.7600  
Email: srich@shb.com

Ryan Sandrock (*pro hac vice*)  
555 Mission Street Suite 2300  
San Francisco, California 94105  
Telephone: (415) 544.1900  
Email: rsandrock@shb.com

*Attorneys for Defendant LeFever Mattson*

**STOKES LAWRENCE, P.S.**

/s/ Valerie Walker

Valerie Walker (WSBA No. 52584)  
Mathew Harrington (WSBA No. 33276)  
1420 Fifth Avenue, Suite 3000  
Seattle, WA 98101-2393  
Telephone: (206) 626-6000  
Email: Mathew.Harrington@stokeslaw.com  
Email: Valerie.Walker@stokeslaw.com

**SPENCER FANE LLP**

Jessica Nelson (*pro hac vice*)  
Donald Heeman (*pro hac vice*)  
100 South Fifth Street, Suite 2500  
Minneapolis, MN 55402  
Telephone: (612) 268-7006  
Email: jnelson@spencerfane.com  
Email: dheeman@spencerfane.com

*Attorneys for Defendant Manco Abbott, Inc.*

**K&L GATES LLP**

/s/ Christopher M. Wyant

Christopher M. Wyant (WSBA No. 35561)  
Tyler Lichter (WSBA No. 51090)  
925 Fourth Avenue, Suite 2900  
Seattle, WA 98104  
Phone: (206) 623-7580  
Fax: (206) 623-7022  
Email: chris.wyant@klgates.com  
tyler.lichter@klgates.com

Lauren Norris Donahue (*pro hac vice*)  
70 W. Madison St., Ste. 3300  
Chicago, IL 60602  
Telephone: (312) 372-1121  
Fax: (312) 827-8000  
Email: lauren.donahue@klgates.com

Derek Sutton (*pro hac vice*)  
301 Hillsborough St., Suite 1200  
Raleigh, NC 27603  
Telephone: (919) 743-7331  
Fax: (919) 516-2122  
Email: derek.sutton@klgates.com

*Attorneys for Defendant R.D. Merrill  
Real Estate Holdings, LLC*

**BRADLEY BERNSTEIN SANDS LLP**

/s/ Heidi B. Bradley

Heidi B. Bradley (WSBA No. 35759)  
2800 First Avenue, Suite 326  
Seattle, WA 98121  
Telephone: (206) 337-6551  
Email: hbradley@bradleybernstein.com

*Attorney for Defendant Morguard Corporation*

**GORDON REES SCULLY  
MANSUKHANI, LLP**

/s/ Todd A. Bowers

Todd A. Bowers (WSBA No. 24638)  
701 5th Avenue, Suite 2100  
Seattle, WA 98104  
Telephone: (206) 695-5197  
Email: tbowers@grsm.com

**ROETZEL & ANDRESS**

Stephen W. Funk (*pro hac vice*)  
222 South Main Street, Suite 400  
Akron, OH 44308  
Telephone: (330) 849-6602  
Cell: (330) 819-5387  
Email: sfunk@ralaw.com

*Attorneys for Defendant Summit  
Management Services, Inc.*

**MATTHEW CARVALHO,  
ATTORNEY AT LAW, PLLC**

/s/ Matthew A. Carvalho

Matthew A. Carvalho (WSBA No. 31201)  
720 Seneca Street  
Seattle, WA 98101  
Telephone: (206) 799-6888  
Email: matt@mattcarvalholaw.com

**DEBEVOISE & PLIMPTON LLP**

Maura K. Monaghan (*pro hac vice*)  
Michael Schaper (*pro hac vice*)  
Kristin D. Kiehn (*pro hac vice*)  
66 Hudson Boulevard  
New York, NY 10001  
Telephone: (212) 909-6000  
Email: mkmonaghan@debevoise.com  
Email: mschaper@debevoise.com  
Email: kdkiehn@debevoise.com

Abraham Tabaie (*pro hac vice*)  
650 California Street  
San Francisco, CA 94108  
Telephone: (415) 738-5700  
Email: atabaie@debevoise.com

*Attorneys for Defendant Yardi Systems, Inc.*